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14 * *Pro Hac Vice* Application To Be Filed

15 Attorneys for Plaintiff

16 UNITED STATES DISTRICT COURT

17 CENTRAL DISTRICT OF CALIFORNIA

18 PRISON LEGAL NEWS, a project of the
HUMAN RIGHTS DEFENSE CENTER,

19 Plaintiff,

20 v.

21 COUNTY OF VENTURA; GEOFF DEAN,
22 GARY PENTIS, LINDA OKSNER, and
23 RICK BARRIOS, in their individual and
official capacities, DOES 1-10, in their
individual and official capacities,

24 Defendants.
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Case No. cv-14-0773-GHK (EX)

**DECLARATION OF STEVE C.
MARSHALL IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

Date: March 17, 2014
Time: 9:30 a.m.
Dept.: 650
Judge: Hon. George H. King

1 I, Steve C. Marshall, declare:

2 1. I am an attorney admitted to practice law in the State Courts of the
3 State of California. Brian A. Vogel, the counsel of record for the plaintiff in this
4 case, employs me to assist in this case. I have personal knowledge of the matters set
5 forth herein, and if called as a witness I could competently so testify. I make this
6 declaration in support of Plaintiff's Motion for Preliminary Injunction.

7 2. On January 21, 2014, I spoke with three inmates at the Ventura County
8 Jail, Todd Road Facility in Santa Paula, CA: Jose Contreras, booking no. 1286672;
9 Ramon Leyva, booking no. 1305597; and Eric Rapacz; booking no. 1275937.

10 3. I showed Mr. Contreras a copy of the envelope from the information
11 packet that PLN tried to send to Mr. Contreras but which was returned to PLN
12 marked "Return to Sender – Postcards Only – No Envelopes." Mr. Contreras told
13 me that he did not receive a copy of the Detainee/Inmate Return Notice from
14 Ventura County Jail regarding this piece of mail.

15 4. I asked Mr. Contreras if he has witnessed any inmates at Todd Road
16 Jail receiving magazines which contained advertisements or pictures considered
17 "sexually suggestive." He said yes, he has seen inmates receive "Men's Fitness"
18 and "Men's Health."

19 5. I showed Mr. Leyva a copy of the envelope from the information
20 packet that PLN tried to send to Mr. Leyva but which was returned to PLN marked
21 "Return to Sender – Postcards Only – No Envelopes." Mr. Leyva told me that he
22 did not receive a copy of the Detainee/Inmate Return Notice from Ventura County
23 Jail regarding this piece of mail.

24 6. I asked Mr. Leyva if he has witnessed any inmates at Todd Road Jail
25 receiving magazines which contained advertisements or pictures considered
26 "sexually suggestive." He said yes, he has seen inmates receive "Men's Health" and
27 "Rolling Stone."

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